May 7, 1999

1 Ten 4(c)

BY FACSIMILE

Michael Vern Federal Trade Commission Premerger Notification Office Room 303 Washington, DC 20580

Confirmation of Conversation Pertaining to Potential 4(c)
 Document

Dear Mr. Vern:

Please accept this letter as confirmation of our discussion on Thursday, May 6, 1999, in which you advised that a document stating only that a transaction may present an unidentified antitrust concern is not a 4(c) document and does need to be submitted along with a Hart-Scott-Rodino filing.

The document we discussed contains no further information or explanation regarding the concern, such as identification of or reference to markets, market shares, competition, competitors, potential for sales growth or expansion into product or geographic markets.

I truly appreciate your time in addressing this issue. Please contact me promptly at in the event that your understanding of our telephone discussion varies in any way from mine.

Sincerely yours,

AGREE . This IS MAT A +(c) DOCUMENT.
Bluckel veur 15/10/99